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December 17, 1997

Food and Drug Administration
Dockets Management Branch (HFA-305)
Room 1-23
1240 Park Lawn Drive
Rockville, MD 20857

RE: "Guide to Minimizing Microbial Food Safety Hazards for Fresh Fruits and Vegetables"

Dear Sirs:

Michigan Farm Bureau is the largest general farm organization in Michigan representing almost 45,000 farm family members. We are pleased to provide these comments regarding the Produce Safety Initiative on behalf of our members who produce fruit and vegetable crops.

Michigan growers take great pride in being a part of the most abundant, most nutritious and safest food production and delivery system in the world. Our growers consider food safety as one of their primary goals.

While we would prefer industry driven food safety initiatives rather than government mandates, we recognize the role of the FDA and USDA in promoting food safety. We support the development of the voluntary guidelines as long as they are based on sound scientific principles. We are concerned that any such guidelines proposed will become mandatory in the future. The agencies must assure the industry that this is not their intent. Even with this assurance we are concerned that the guidelines will become defacto regulations; as we fear that buyers will require compliance by growers.

Grower education is one of the most critical issues regarding adoption of these guidelines. This initiative must provide the necessary education resources and technical assistance to assist in uptake by growers. Michigan Farm Bureau is prepared to assist in dissemination of this educational material.

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Michigan has a large number of diversified fruit and vegetable producers. The guidelines must recognize this great diversity and provide for needed flexibility between a mixture of commodities produced under varying soil, climate and geographic conditions. It is imperative that the guidelines not result in a "one-size-fits-all-standard."

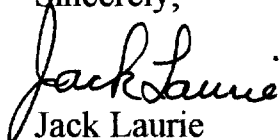
The proposed Produce Safety Initiative indicates that commodity specific guidelines will be developed in the near future. We strongly urge that the guidelines remain generic in scope. Commodity specific guidelines will create confusion among our very diverse grower community and only serve to magnify the already challenging educational effort.

The Administration has indicated that as part of this initiative both guidelines and inspection procedures would be applied to foreign produce imports. We believe that such a requirement would result in similar demands by our foreign produce buyers, thus resulting in foreign intrusion into our production of these commodities. We recommend that any import program developed under the initiative should be implemented in a manner that will not impair our ability to export our commodities.

Many of the guidelines proposed in this initiative are also addressed under other already existing state and federal regulations and guidelines. For instance, Michigan already has a generally accepted management practices program for manure management. We urge that the produce safety guidelines recognize and be consistent with any already existing program.

We appreciate the cooperative spirit demonstrated by the FDA and USDA in this initiative. Both agencies have important roles in food safety. However, agricultural producers and allied organizations have a much closer working relationship with the USDA. The USDA also has an organized presence in most rural communities. For this reason, we urge that USDA be given primary responsibility in this endeavor.

Sincerely,


A handwritten signature in cursive script that reads "Jack Laurie".

Jack Laurie
President

nr

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